

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	CASE NO. 21-31686
	§	
PARK 4 LESS, LLC,	§	(CHAPTER 11)
	§	
<i>Debtor.</i>	§	

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**LIMITED OBJECTION OF DSDY REAL ESTATE, LLC TO CHAPTER 7  
TRUSTEE'S EMERGENCY MOTION TO CONTINUE TO OPERATE THE  
DEBTOR'S BUSINESS AND FOR RELATED RELIEF**

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TO THE HONORABLE CHRISTOPHER M. LOPEZ,  
UNITED STATES BANKRUPTCY JUDGE

DSDY Real Estate, LLC ("DSDY") files this its Limited Objection to the Chapter 7 Trustee's *Emergency Motion To Continue To Operate The Debtor's Business And For Related Relief*; and in support would respectfully show the Court as follows:

**I.**  
**LIMITED OBJECTION**

1. On December 16, 2021, this Court entered an order converting the above-captioned case from Chapter 11 to Chapter 7. [Dkt. # 77].

2. The Office of the United States Trustee appointed Christopher R. Murray as the Chapter 7 Trustee of the Debtor's estate.

3. The Debtor operates a paid parking lot next to William P. Hobby Airport on real property it leases from DSDY.

4. Before the case was converted to Chapter 7, the Debtor failed to pay post-petition rent for June and July 2021. Therefore, DSDY filed a motion to compel the Debtor to pay post-petition rent. [Dkt. # 13]. This Court granted the motion and ordered the Debtor to become current in post-petition rent payments. [Dkt. # 26].

5. DSDY is not opposed to the relief requested in the Trustee's motion provided that the Trustee timely pays all post-petition rent that comes due hereafter.

6. Accordingly, DSDY makes this limited objection and respectfully requests that the Court include in its order a provision requiring the Trustee to timely pay all post-petition rent on or before the first day of each month until the Trustee abandons or rejects the lease and vacates the Leased Premises.

## **II. RESERVATION OF RIGHTS**

7. DSDY reserves the right to supplement this Limited Objection and to respond to any reply of the Trustee, or any other party in interest, either by further submission to this Court, at oral argument or by testimony to be presented at the Emergency Hearing or any other hearing. DSDY further reserves the right to review and comment on any proposed Final Order.

## **PRAYER**

WHEREFORE, DSDY Real Estate, LLC respectfully requests that the Court sustain this limited objection; and grant such other and further relief at law and in equity as is just and proper.

Respectfully submitted,

WILSON, CRIBBS + GOREN, P.C.

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***Attorneys For DSDY Real Estate, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2021, a true and correct copy of the foregoing Motion was served on parties identified below and all parties requesting notices electronically *via* the Court's CM/ECF notification system.

**Via CM/ECF**

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**VIA US MAIL FIRST CLASS**

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